IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO

) CASE NO. 18-62142
) CHAPTER 13
)
) JUDGE KENDIG
) MODIFICATION OF PLAN
)
)
)

Now come Debtors, Mary Greavu, by and through the undersigned counsel, and request a modification of their Chapter 13 plan pursuant to 11 U.S.C. § 1329(a) and Federal Rule of Bankruptcy Procedure 3015(g).

Debtor filed a petition on October 23, 2018. Through the plan, Debtor is contributing \$1205.01 monthly. Her plan was confirmed on January 17, 2019. Debtor is paying a Chapter 7 value of \$1048 to unsecured creditors.

Debtor's boyfriend moved out last summer and debtors social security for her daughters was reduced last year as well. Further, Debtor had to replace her furnace this past winter for a total amount of \$6000. Debtor proposes to retain her 2020 tax refund due to the loss of income and this extraordinary expense that she had this past year. Any delinquency is suspended with approval of this modification and the plan term if necessary will be extended to maintain feasibility.

Wherefore, Debtors pray the Court approve the modification and grant such other relief as may be just and appropriate.

Submitted by:

/s/Nicole L. Rohr-Metzger Nicole L. Rohr-Metzger (#0078316) Thrush & Rohr, L.L.C. 4930 Hills & Dales Rd., NW Canton OH 44708 (330) 479-9494 (330) 479-9585 fax Counsel for Debtors

IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO

IN THE MATTER OF:) CASE NO. 18-62142
) CHAPTER 13
MARY ELLEN GREAVU)
) JUDGE KENDIG
)
) NOTICE OF MODIFICATION OF PLAN
DEBTORS)

Debtors have filed papers with the Court seeking to modify their Chapter 13 plan.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have any attorney, you may wish to consult one.)

If you do not want the court to grant the requested modification, or if you want the court to consider your views on the modification, then on or before <u>May 14, 2021</u> you or your attorney must:

File with the court a written response, explaining your position, and a written request for a hearing, at:

U.S. Bankruptcy Court, Ralph Regula U.S. Courthouse, 401 McKinley Ave SW, Canton, OH 44702

If you mail your response to the court for filing, you must mail it early enough so that the court will **receive** it on or before the date state above.

You must also mail a copy to:

Nicole L. Rohr-Metzger

Thrush & Rohr, L.L.C.

4930 Hills & Dales Rd., NW

Canton, Ohio 44708

Dynele Schinker-Kuharich

Office of the Chapter 13 Trustee

200 Market Avenue North Ste LL30

Canton, Ohio 44702

If you or your attorney do not take these steps, the court may decide that you do not oppose the modification and the modification may be granted.

Date: April 23, 2021 Signature: /s/Nicole L. Rohr-Metzger

Name: Nicole L. Rohr-Metzger

4930 Hills & Dales Rd., NW Canton OH 44708

CERTIFICATE OF SERVICE

I certify that On April 23, 2021, a true and correct copy of the foregoing was served:

Via the Court's Electronic Case Filing System on these entities and individuals who are listed on the Court's Electronic Mail Notice List:

- Nicole L. Rohr-Metzger nicole@thrushandrohr.com, office@thrushandrohr.com;thrushrohr@gmail.com
- Dynele L Schinker-Kuharich DLSK@Chapter13Canton.com, <u>dschinkerkuharich@ecf.epiqsystems.com</u>
- United States Trustee (Registered address)@usdoj.gov

And by regular U.S. mail, postage prepaid, on:

See attached matrix

/s/ Nicole L. Rohr-Metzger Nicole L. Rohr -Metzger Label Matrix for local noticing 0647-6 Case 18-62142-rk Northern District of Ohio Canton Fri Apr 23 11:38:19 EDT 2021

AMCA PO Box 1235 Elmsford, NY 10523-0935

American Medical Response of OH 50 South Main Street Suite 401 Akron, OH 44308-1829

Auto-Owners Insurance Company PO Box 30660 Lansing, MI 48909-8160

Credence Resource Management 17000 Dallas Parkway Ste 204 Dallas, TX 75248-1940

Directv, LLC by American InfoSource as agent PO Box 5008 Carol Stream, IL 60197-5008

GM Financial PO Box 78143 Phoenix, AZ 85062-8143

Mercy Medical Center PO Box 951082 Cleveland, OH 44193-0005

Midland Funding LLC PO Box 2011 Warren, MI 48090-2011

Phillips & Cohen Associates Mail Stop 2001 1002 Justison Street Wilmington, DE 19801-5148 PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541-1021

Akron Children's Hospital PO Box 1750 Akron, OH 44309-1750

American Medical Response of Ohio PO Box 100217 Atlanta, GA 30384-0217

CMCS 10192 Grand River Rd Ste 111 Brighton, MI 48116-6531

Credence Resource Management LLC P.O. Box 2420 Southgate, MI 48195-4420

First American Loans 4313 Tuscarawas Street W Canton, OH 44708-5461

HSBC Bank Nevada N.A. C/o Portfolio Recovery Associates PO Box 12914 Norfolk, VA 23541-0914

Midland Funding LLC 2365 Northside Drive #300 San Diego, CA 92108-2709

Modernpath Inc RBC Inc PO Box 1548 Mansfield, Ohio 44901-1548

(p)PORTFOLIO RECOVERY ASSOCIATES LLC PO BOX 41067 NORFOLK VA 23541-1067 United States Bankruptcy Court Ralph Regula U.S. Courthouse 401 McKinley Avenue SW Canton, OH 44702-1745

(p) AMERICREDIT FINANCIAL SERVICS DBA GM FINAN PO BOX 183853 ARLINGTON TX 76096-3853

Auto Owners Insurance 6101 Anacapri Blvd Lansing, MI 48917-3994

Capital One Bank USA NA PO Box 6492 Carol Stream, IL 60197-6492

(p)DIRECTV LLC
ATTN BANKRUPTCIES
PO BOX 6550
GREENWOOD VILLAGE CO 80155-6550

FirstCredit, Inc (FCI) PO Box 630838 Cincinnati, OH 45263-0838

Jennifer Tanaka 1100 Superior Avenue 19th Floor Cleveland, OH 44114-2521

Midland Funding LLC C/O statutory agent William Ritchey 674 Oblerlin Elyria Rd Elyria, OH 44035-7728

North Shore Agency/Pro Active 270 Spagnoli Rd Suite 111 Melville, NY 11747-3515

Quest Diagnostics PO Box 71314 Philadelphia, PA 19176-1314 (p)RBC PO BOX 1548 MANSFIELD OH 44901-1548 RPM 20816 44th Ave W Lynnwood, WA 98036-7799 Radiology Services of Canton P O Box 20238 Canton, OH 44701-0238

Radiology Services of Canton RBC Inc PO Box 1548 Mansfield, Ohio 44901-1548 (p)ROSSMAN & CO PCB PO BOX 2051 NEW ALBANY OH 43054-2051 SST/CIGPF1CORP 4315 Pickett Rd Saint Joseph, MO 64503-1600

Santander Consumer USA ATTN Bankruptcy Dept PO Box 560284 Dallas, TX 75356-0284 Santander Consumer USA, Inc. P.O. Box 560284 Dallas, TX 75356-0284 Synchrony Bank - Care Credit Attn: Bankruptcy Dept. PO Box 965060 Orlando, FL 32896-5060

U.S. Bank National Association, et al. c/o Rushmore Loan Management Services P.O. Box 55004 Irvine, CA 92619-5004 US Department of Education P.O. Box 16448 St. Paul, MN 55116-0448 US Dept of Education PO Box 5609 Greenville, TX 75403-5609

VCSO of Ohio, Inc. d/b/a First American Loan 135 N. Church Street Spartanburg, SC 29306-5138 Wells Fargo Bank, N.A. Default Document Processing N9286-01Y 1000 Blue Gentian Road Eagan MN 55121-7700 Wells Fargo Home Mortgage PO Box 14538 Des Moines, IA 50306-3538

Dynele L Schinker-Kuharich Office of the Chapter 13 Trustee 200 Market Avenue North, Ste. LL30 Canton, OH 44702-1435 Mary Ellen Greavu 3704 Argyle Road SE Canton, OH 44707-1912 Nicole L. Rohr-Metzger Thrush & Rohr LLC 4930 Hills & Dales Rd NW Canton, OH 44708-1406

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

AmeriCredit Financial Services, Inc. dba GM Financial P O Box 183853 Arlington, TX 76096 DirecTV PO Box 78626 Phoenix, AZ 85062 Portfolio Recovery PO Box 12914 Norfolk, VA 23541

(d)Portfolio Recovery Associates, LLC POB 12914 Norfolk VA 23541 RBC PO Box 1548 Mansfield, OH 44901

Rossman and Co PO Box 2051 New Albany, OH 43054

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)U.S. Bank National Association, not in its

(u) Wells Fargo Bank, N.A.

(d)PRA Receivables Management, LLC PO Box 41021 Norfolk, VA 23541-1021

End of Label Matrix
Mailable recipients 47
Bypassed recipients 3
Total 50